

## Singerman, Joel

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**From:** Miller, John Y (DEC) <john.miller@dec.ny.gov>  
**Sent:** Wednesday, October 13, 2021 12:22 PM  
**To:** Garbarini, Doug; Singerman, Joel  
**Cc:** Eaton, Daniel J (DEC); Brown, Janet E (DEC)  
**Subject:** Citizens MGP - NAPL Recovery Measures  
**Attachments:** Citizens NAPL Recovery Measures - NYSDEC Response Update 10\_6\_2021.pdf

Doug/Joel,

Attached for discussion at next Monday's meeting is a preliminary draft of coal tar recovery controls. It is anticipated that these controls would be included in the site's draft interim site management plan which is currently being developed by National Grid.

Thanks

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**National Grid**  
**Citizens MGP Site – Typical NAPL Recovery Controls**

The Citizens MGP site remediation includes non-aqueous phase liquid (NAPL) monitoring and recovery (as necessary). The NAPL recovery efforts will be completed in accordance with the future NYSDEC required Site Management Plan by qualified personnel using best management practices that are protective of the public and the environment. The best management practices typically include the following:

1. Regulatory Owner Notification: The schedule for the monitoring and recovery activities will be identified so that NYSDEC can observe the recovery activities.
2. Establish Work Zones: A designated work zone (which is typically an approximately 10'x10' area) will be established around the well recovery area using visible/physical barriers (such as high visibility cones and caution tape) to prevent unauthorized or accidental entry into the work zone. Effort will be made to maximize the setback between the well recovery area and the public as necessary.
3. Conduct Air Monitoring: Air monitoring will be conducted using a calibrated photo ionization detector (PID) and there will be routine evaluation of odors within the work zone, to confirm that the best management practices are effectively controlling vapors and odors during monitoring and recovery efforts.
4. Secondary Spill Control Measures: Polyethylene sheeting will be installed on the ground around the well recovery area to cover the well head and provide secondary containment during NAPL recovery. In addition, spill containment kits with absorbent materials (such as absorbent pads) will be maintained within the work area.
5. NAPL Collection and Containerization to Minimize Volatilization: Collected material will be transferred directly from the well head into a drum or other appropriate container for subsequent disposal off site. Measures such as use of sealed, flexible connectors (e.g., fernco or PVC slip cap) at the well head and drum/container bung hole will also be used to prevent the NAPL from coming in direct contact with ambient air.
6. Removal of Work Zone: After completing the NAPL collection, the well cap will be resecured, equipment and control measures used during the recovery activities will be removed, and the recovery area work zone barriers will be removed.

Best management practices will be reviewed regularly and changes to the NAPL recovery controls will be made as appropriate based on field observations and input from NYSDEC.